From: Ignatius Grande <igrande@thinkbrg.com>

**Sent:** Monday, June 2, 2025 9:49 AM

**Subject:** RE: IME WatchDog, Inc. v. Gelardi, et al. (1:22-cv-1032)

**CAUTION - EXTERNAL:** 

Dear Judge Chen,

I hope that you are doing well. I wanted to send you an update regarding the pending payments by Ms. Gelardi.

Last Tuesday, May 25th, Ms. Gelardi, sent a Zelle payment of \$500 to me personally. She had received instructions on how to make payments and was never provided with my personal Zelle contact information, but I believe that she made that payment using my mobile phone number which is listed in my signature line.

Later that same day, I notified Ms. Gelardi that she had to make her payment to BRG, not to me personally and I refunded the \$500 payment. I explained to her that BRG does not take Zelle payments, but that she needed to either make a wire transfer or to send a check. She had discussed sending a wire payment, but proceeded to mail us a check on Wednesday, May 28th

I received notification from Ms. Gelardi on Wednesday, 5/28, that she was mailing BRG two separate checks of \$500 - one for the May payment and one for the June payment. She sent me copies of both checks and a photo of the envelope with the first class stamp that she used.

We have not yet received the checks (neither the payment that was supposed to be submitted by 5/1 nor the payment that was due on 6/1). Our Finance department has indicated that checks can take up to a week before they reach us. We have let the cash team know we are expecting these so they will be on the lookout. I will send you a note as soon as we do receive the checks.

I also have notified Ms. Gelardi that in order to comply with the Court's order going forward that it would be in her best interest to make payments by wire transfer (or to send her checks well before the court-imposed deadline).

Please let me know if you have any questions or if you need any additional information.

Best regards,

Ignatius

Ignatius Grande, Esq. | Director

Global Investigations + Strategic Intelligence

Digital Forensics, Corporate Investigations, E-Discovery

**Berkeley Research Group, LLC** 

810 Seventh Avenue, Suite 4100 | New York, NY 10019

D 646.809.8066 | M 718.249.7203

igrande@thinkbrg.com | thinkbrg.com

